

# **Exhibit 34**

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May 28, 2020

**BY EMAIL**

Jeffrey A. Rosenthal, Esq.  
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**Re: In Re Application of Benjamin Steinmetz for an Order to Take Discovery from  
Vale S.A., Vale Americas Inc., Rio Tinto plc, and Rio Tinto Limited pursuant to  
28 U.S.C. Section 1782, Case No. 20-mc-212-AJN (S.D.N.Y.)**

Dear Counsel:

We write on behalf of Applicant Benjamin Steinmetz (“Mr. Steinmetz”) in response to your letter of May 27, 2020, in relation to the above-referenced proceeding.

At your request we previously provided you with transcripts and audio recordings of the six conversations that Dr. Avi Yanus describes and excerpts in his declaration, even though our client was and is under no obligation to provide you with any such materials. Our client does not intend to share other recordings/materials from the investigation at this time but might choose to do so later.

In our letter of May 26, 2020, we requested that you and your clients, Vale S.A. and Vale Americas Inc., preserve certain categories of documents. Please confirm by close of business tomorrow, May 29, 2020, that you and your clients will comply with our request.

Sincerely,

/s/ Josef M. Klazen  
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**AMERICAS** (NEW YORK, BUENOS AIRES, CHICAGO, DELAWARE, MIAMI, SAN FRANCISCO, SÃO PAULO, WASHINGTON DC)  
**ASIA-PACIFIC** (HONG KONG, SEOUL, SHANGHAI), **EMEA** (LONDON, TEL AVIV), **OFFSHORE** (BVI, CAYMAN ISLANDS)

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